

ENCLOSURE 1

NOTICE OF VIOLATION

Tennessee Valley Authority  
Watts Bar Unit 1

Docket No. 50-390  
License No. CPPR-91

During the Nuclear Regulatory Commission (NRC) inspection conducted October 20 through November 16, 1990, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violation is listed below:

Part 50 of Title 10 of the Code of Federal Regulations, Appendix B, Criterion XVI, "Corrective Action," is implemented in part by the Nuclear Quality Assurance Plan (NQAP), Paragraph 10.4, which endorses ANSI N45.2-1971 (Section 16) and requires that measures be established to assure that Conditions Adverse to Quality (CAQs), such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Paragraphs 1.1, 1.4, 5.10, and 6.4.1 of site procedure AI-2.8.14, Revision 2, (effective May 19, 1989 through June 18, 1990) Corrective Action, state that CAQs are to be promptly identified. Paragraph 6.2 states that in case of doubt, a Condition Adverse to Quality Report (CAQR) should be initiated. Paragraph 6.11.4.B.6 states that the corrective action shall include any generic implications of the CAQ within the responsible organizations division or site and shall not be limited to merely addressing the specific CAQ that was identified.

Section 3.0, of AI-2.8.15 Revision 0", Corrective Action" states that it is the responsibility of all individuals to promptly identify and report all discovered CAQs. Section 3.3.1 H establishes that a determination be made of the specific actions to be taken to correct the CAQ and prevent its recurrence. Section 3.3.3 A establishes that the implementing organization is to implement and/or monitor implementation of approved corrective action.

Contrary to the above, conditions adverse to quality were not promptly documented in accordance with site procedure AI-2.8.14, or AI-2.8.15 or corrected as detailed below:

- (1) Numerous errors noted in completed unit 1 ASME Code N-5 data packages and informally documented in log books and on uncontrolled personal computer data base from February 23, 1989, through August 31, 1989, were not documented on CAQR WBP 900145 until March 29, 1990. The date these CAQs were discovered were listed on the CAQR as March 28, 1990. This CAQR was issued (approved) on June 15, 1990.

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- (2) The absence of the required Quality Engineer review signatures from completed (vault filed and microfilmed) Maintenance Requests (MRs) A-585770, A-528446, and A-406051 was informally documented in logbooks and a personal computer data base on April 25, and July 27, 1989 respectively, but not formally documented on (PRD) WBP 890508 until September 29, 1989. The date these CAQs were discovered was listed on the CAQR as September 28, 1989.
- (3) The lack of Authorized Nuclear Inspector review and involvement for welding activities related to three valves and a pipe flange on Workplan 4148, as required by the ASME Code, was informally documented on May 5, 1989, in a logbook and a personal computer database, but not documented in the corrective action program as of October 25, 1990.
- (4) PRD WBP 900131P, Revision 0, was dispositioned with erroneous information which resulted in inadequate corrective action for this CAQ. CAQR WBP 900131, Revision 1, was independently verified and closed on August 24, 1990, with missing and inadequate documentation of corrective action. In addition, the corrective action section of this CAQR was not revised to perform additional evaluations after the initial review identified numerous discrepancies in incorporation of new engineering criteria into work documents.
- (5) The corrective action for PRD WBP 89316P did not address the statement of the Condition Adverse to Quality or provide adequate justification for the resolution. The CAQ was stated as a misclassification of a procedure as non-safety related and non-quality related. The corrective action was to revise the procedure to designate the records produced by that instruction as non-QA. The corrective action did not address the non-safety related classification or provide justification that a procedure is non-QA related because no procedure specific QA documents are produced. The corrective action did not provide any justification for changing the QA output of the procedure (Corrective Action Plans) from a QA document to a non-QA document. The corrective action did not identify other TVA procedures, such as AI-12.2, "Protection of Safeguards Information," and Nuclear Power Standard 5.6.5, "Protecting Safeguards Information," that are incorrectly classified as non-QA related.

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Watts Bar within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [for each violation]: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved.

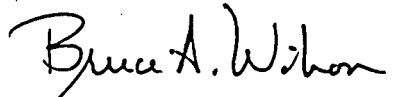
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Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION

  
Bruce A. Wilson, Chief  
TVA Projects

Dated at Atlanta, Georgia  
this 20<sup>th</sup> day of December 1990